

September 5, 2007

MEMORANDUM TO: Those on the Attached List

FROM: Luis A. Reyes */RA/*
Executive Director for Operations

SUBJECT: GUIDANCE FOR PERIODIC REVIEW OF AGENCY NETWORK
DRIVES FOR THE PRESENCE OF PERSONALLY
IDENTIFIABLE INFORMATION

As a result of Office of the Inspector General (OIG) Audit OIG-06-A-14, concerning personal privacy information found on shared network drives, each office/region was directed to review data generated or stored on shared drives for Personally Identifiable Information (PII). As of April 18, 2007, these searches of agency shared drives for PII were completed and all PII that was identified was either removed from the shared drives or access to it was restricted to individuals with a "need to know." Staff should not place PII on agency shared drives unless access to it is restricted to individuals with a "need to know."

The same OIG audit also recommended the development of policies and procedures for periodically reviewing agency network drives for the presence of PII. Effective with the date of this memorandum, I have approved the following guidance for reviewing agency shared drives for PII:

- The NRC will review all agency shared drives for the purposes of identifying and eliminating PII at least annually.
- Beginning in January of each year, the Office of Information Services (OIS) will search all agency-shared drives for files potentially containing PII. Search strings will be used and identified files will be grouped by the originating office/region by OIS. No later than January 31st of each year, the OIS will provide each office/region with its list of files that may contain PII.
- With OIS concurrence, offices/regions may arrange with OIS for more frequent searches (but no more than one per quarter). Based on their expressed interest in conducting their own searches and their capability to do so, regions may perform their own searches but must coordinate with OIS to ensure they have the current search criteria.

CONTACT: Russell Nichols, IRSD/OIS
(301) 415-6874

- Each search will begin where the previous search finished, i.e., the cutoff date for the previous search will serve as the beginning date of the new search. Only files placed on the drive after the end date of the previous search, or previously existing files that were modified after the end date of the previous search, will be reviewed.
- Offices/regions will review the files identified by the OIS and determine whether or not each file contains PII. If a file contains PII, the office/region will determine if the file should remain on the drive and, if so, whether adequate access controls are in place. The office/region will restrict access to the file if adequate controls are not in place, and will remove the file from shared drives upon determining that the file is not appropriate for shared access or is no longer needed. Offices/regions will report to OIS no later than March 31st that they have reviewed the files and have taken appropriate action.

This policy will be incorporated into Management Directive 12.6 when it is updated to include all revised Sensitive Unclassified Non-Safeguards Information policy.

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This policy will be incorporated into Management Directive 12.6 when it is updated to include all revised Sensitive Unclassified Non-Safeguards Information policy.

DISTRIBUTION: EDATS: OIS-2007-0026

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|---------------------|-----------------------|---------------------|
| D. Ash, DEDIS/CIO | E. Baker, D/OIS | R Nichols, OIS/IRSD |
| W. Kane, DEDR | K. Greene, DD/OIS | 200600352 |
| M. Malloy, OEDO | J. Linehan, OIS/IRSD | 07-054 (CIO) |
| V. Ordaz, AO | M. Thaggard, OIS/IRSD | OIG r/f |
| M. Virgilio, DEDMRT | M. Janney, OIS/IRSD | OIS r/f |

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Publicly Available Non-Publicly Available Sensitive Non-Sensitive

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|--------|------------|------------|----------------------|------------|--------------|------------|
| OFFICE | QTE | OIS/ICOD | OIS/ICOD | OIS/BPIAD | OIS/BPIAD | Region I |
| NAME | L.Culp | J.Shields | J.Davis | M.Kemerer | N.Nguyen | L.Manning |
| DATE | 06/21/2007 | 06/07/2007 | 05/22/2007 | 06/07/2007 | 06/06/2007 | 05/30/2007 |
| OFFICE | Region II | Region III | Region IV | OIS/IRSD | OGC | OIS/IRSD |
| NAME | S.Flynn | R.Doornbos | J.Pellet | R.Nichols | T.Rothschild | M.Janney |
| DATE | 06/12/2007 | 06/06/2007 | 06/04/2007 | 07/20/2007 | 06/22/2007 | 07/20/2007 |
| OFFICE | IRSD/OIS | IRSD/OIS | DD/OIS | D/OIS | DEDIS/CIO | EDO |
| NAME | M.Thaggard | J.Linehan | K.Greene | E.Baker | D.Ash | L. Reyes |
| DATE | 07/23/2007 | 07/26/2007 | 08/1/2007 | 08/24/2007 | 09/05/2007 | 09/05/2007 |

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 PRESENCE OF PERSONALLY IDENTIFIABLE INFORMATION

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